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March 19, 2021

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street NE, Room 1A  
Washington, D.C. 20426

Re: WBI Energy Transmission, Inc.  
North Bakken Expansion Project  
Docket Nos. CP20-52-000 and CP20-52-001

Dear Ms. Bose:

More than a year and a half ago in July 2019, WBI Energy Transmission, Inc. (WBI Energy) initiated the Federal Energy Regulatory Commission's (FERC or Commission) National Environmental Policy Act pre-filing review process for its North Bakken Expansion Project (Project). Following the conclusion of the pre-filing review process, on February 14, 2020, WBI Energy filed an application with the Commission requesting a Certificate of Public Convenience and Necessity (Certificate) under section 7(c) of the Natural Gas Act to construct, modify, operate, and maintain natural gas transmission facilities in McKenzie, Williams, Mountrail, and Burke Counties, North Dakota associated with the Project. On July 28, 2020, WBI Energy amended its application proposing a reduction in the Project's incremental firm transportation design capacity from 350,000 million cubic feet (mcf) per day to 250,000 mcf per day<sup>1</sup>. There were no interventions filed for either the application submitted on February 14, 2020 or the amended application filed on July 28, 2020.

The Project is of critical importance to the Project shippers. The purpose of the Project is to provide incremental firm transportation capacity from six natural gas processing plants to a proposed interconnect with Northern Border Pipeline Company. New pipeline infrastructure in the Williston Basin of northwest North Dakota is vitally needed to support the transportation of increasing levels of associated natural gas production and to aid in the reduction of natural gas flaring. On July 1, 2014, the North Dakota Industrial Commission issued Order No. 24665 which established limits on the amount of natural gas that could be flared by oil and natural gas production companies in North Dakota. The current flaring limit is nine percent as of November 1, 2020. The Project will assist North Dakota producers and operators in meeting the gas capture targets established by Order No. 24665 by providing an additional outlet for natural gas volumes which otherwise may be flared in the absence of the transportation capacity provided by the Project. In addition, WBI Energy's existing pipeline infrastructure is at capacity within the region due to the increase in associated natural gas

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<sup>1</sup> The reduction in design capacity was proposed to align the Project with market conditions resulting from oil and natural gas production challenges associated with a global oversupply of oil, in combination with the effects of the sudden and unforeseeable COVID-19 pandemic. The reduction in design capacity will be accomplished by reducing the number of additional compressor units at WBI Energy's existing Tioga Compressor Station from six units to three units.

production over the past several years. The Project will provide an opportunity to reduce current capacity allocations on WBI Energy's pipeline system.

WBI Energy has entered into six binding Precedent Agreements with non-affiliated shippers for Project capacity. On October 23, 2020, WBI Energy filed updated capacity and term information associated with the Precedent Agreements reflecting total firm incremental subscribed capacity up to 245,000 equivalent dekatherms per day with 10 and 11-year terms. WBI Energy worked closely with its Project shippers during the economic downturn to ensure the viability and continued need for the Project.

WBI Energy previously requested the Commission issue a Certificate for the Project by February/March 2021 to allow WBI Energy sufficient time to complete construction of this important Project by November 1, 2021 and meet its contractual obligations to the Project shippers who are depending on this much needed pipeline infrastructure. For the forgoing reasons, WBI Energy respectfully requests that the Commission issue an order in this certificate proceeding no later than April 15, 2021 in order to meet an in-service date of November 1, 2021 and provide the benefits described above.

Respectfully Submitted,

/s/ Trevor Hastings

Trevor Hastings  
President and Chief Executive Officer  
WBI Energy, Inc.

Courtesy Copies via Email:

The Honorable Chairman Richard Glick, FERC  
The Honorable Commissioner Neil Chatterjee, FERC  
The Honorable Commissioner James Danly, FERC  
The Honorable Commissioner Allison Clements, FERC  
The Honorable Commissioner Mark C. Christie, FERC  
All Parties